SULLIVAN & CROMWELL LLP

TELEPHONE: 1-212-558-4000 FACS1MILE | 1 212 558 3588 | WWW 5012 CROM COM

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #:
DATE FILED: 5/2/14

125 Broad Arcet
New York, NY 10004-2498
LCS ANGELES + PALO ALTO + WASHINGTON, D.G
FRANKFURT + LONDON + PARIS
BELLING + HONG KONG + TOKYO
MELINGUANE + SYDNEY

May 1, 2014

Via ECF and Hand

The Honorable Debra Freeman,
United States Magistrate Judge,
United States District Court, Southern District of New York,
Daniel Patrick Moynihan United States Courthouse,
500 Pearl Street,
New York, New York 10007-1312.

Re: Dodona I, LLC v. Goldman, Sachs & Co.; et al.,

No. 10 cv-7497 (VM) (DCF)

MEMO ENDORSED

Dear Judge Freeman:

I write on behalf of defendants Goldman, Sachs & Co., The Goldman Sachs Group, Inc. (together with Goldman, Sachs & Co., "Goldman Sachs"), Peter L. Ostrem ("Ostrem") and Darryl K. Herrick ("Herrick") (collectively, "Defendants"), regarding the Court's April 23, 2014 Order concluding that it was "reasonable, given the size and complexity of this case," to permit Lead Plaintiff Dodona I, LLC ("Dodona") to serve up to 150 requests for admission ("RFAs") on Goldman Sachs and up to 20 additional RFAs on each of Ostrem and Herrick. Out of fairness and in light of the Court's ruling as to the size and complexity of the case, Defendants request that the Court confirm that Goldman Sachs may serve on Dodona up to 150 RFAs (inclusive of RFAs already served), and that each of Ostrem and Herrick may serve on Dodona up to 20 additional RFAs. Dodona does not oppose Defendants' request to serve these additional RFAs.

Respectfully submitted,

Richard H. Klapper

ce: All counsel of record (via e-mail and ECF)

SO ORDERED:

DATE: <u>\$ / 2/1 / </u>

DEBRA FREEMAN
UNITED STATES MAGISTRATE JUDGE